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December 28, 2007

Ms. Theresa Stiner
Planning, Permitting, and Engineering Section
Iowa Department of Natural Resources
Wallace Building, 502 East 9th Street
Des Moines, Iowa 50219-0034

Subject: End of Life Vehicle Solutions Corporation Annual Manufacturers' Implementation Report

Dear Ms. Stiner,

Iowa Administrative Code 567-Chapter 215, "Mercury-Added Switch Recovery from End-of-Life Vehicles", requires vehicle manufacturers to annually report:

- (1) the number of mercury-added switches collected
- (2) an estimate of the amount of mercury contained in the collected switches
- (3) the capture rate
- (4) the estimated number of vehicles manufactured containing mercury added switches; and
- (5) the estimated number of vehicles that have been processed for recycling

This report is provided by End of Life Vehicle Solutions Corporation on behalf of its member automotive companies. The participating members of ELVS are BMW of North America, LLC; Chrysler LLC; Ford Motor Company; General Motors Corporation; International Truck & Engine; Mack Trucks Inc.; Mitsubishi Motors North America, Inc.; Nissan North America, Inc.; Porsche Cars North America, Inc.; Toyota Motor Sales USA, Inc. America; Subaru of America, Inc.; Volkswagen of America, Inc.; and Volvo Trucks North America.

Through December 15, 2007 a total of 9,094 mercury switches were delivered to the ELVS recycling contractor from Iowa dismantlers, yielding 20 pounds of recovered mercury. There are 366 registered dismantlers in Iowa, ten of which have submitted switches.

The estimated number of switches available for recovery in Iowa during 2007 was 83,000, resulting in a capture rate through December 15, 2007 of 10.96%.

ELVS uses the National Vehicle Mercury Switch Recovery Program (NVMSRP) Switch Retirement Model (www.elvsolutions.org/model.html) approved by the U.S. EPA and program partners to estimate mercury switch populations. The model was developed to identify switch populations and estimate mercury switch retirement rates through 2017. Therefore the model focuses on mercury switch counts rather than vehicle counts. The model reports that the estimated national total number of mercury switches historically manufactured in vehicles to be 169,185,000. Most of the vehicles containing these switches have already been scrapped, with an estimated 31,115,000 switches remaining in today's national fleet for collection through 2017. Iowa's portion of these switches remaining for collection through 2017 is estimated at 535,000.

The number of mercury switches that were available nationally for recovery in 2007 is estimated to be 4,569,000 units. In Iowa, 83,000 switches were available for recovery in 2007.

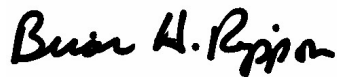
Information about the number of mercury switches recovered, the total amount of mercury processed, and a listing of participating dismantlers in Iowa is available through the ELVS website, www.elvsolutions.org with linkage to our contractor's website, <http://www.eqonline.com/services/ELVS-Mercury-Switch-Recovery-Program/annual-report.asp?year=all>. Information is updated daily as additional switches are received by our contractor, and is now available for downloading into Excel for your convenience. As mentioned above, the NVMSRP Switch Retirement Model is available at www.elvsolutions.org/model.html.

These web-based data tracking systems are part of ELVS' commitment to data accessibility, and will be available at least until 2017. ELVS requests that you consider if this data tracking system is sufficient to meet Iowa's reporting requirements, allowing us in the future to dispense with the formality of written progress reports.

Going forward, NVMSRP member organizations will continue to develop additional outreach efforts to the scrap recycling facilities and vehicle recyclers in Iowa and provide them with the necessary materials to remove mercury switches. Early next year, ELVS will be publishing and distributing a new picture-based mercury switch reference chart to all dismantlers in the state. The steel industry is increasing its outreach efforts to dismantlers, encouraging them to ship mercury-free scrap steel. We believe that these efforts will increase the number of dismantlers recovering and submitting mercury switches to ELVS for recycling.

If you have any questions or comments regarding this report, please contact me at brelvs@yahoo.com or 248-477-7357.

Sincerely,

A handwritten signature in black ink that reads "Brian H. Rippon". The signature is written in a cursive, slightly slanted style.

Brian Rippon
End of Life Vehicle Solutions
Project Manager